

**MEMO ENDORSED**



**STILLMAN LEGAL, P.C**

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April 5, 2024

**VIA ECF**

The Honorable Valerie Caproni  
Eastern District of New York

Re: 1:23-cv-06032-VEC Suarez v. BQA Transport LLC

Honorable Judge Caproni:

I hope this letter finds you well. I am writing to inform the Court of a recent development in the above-referenced matter. As counsel for the Plaintiff, Erving Suarez, I previously filed a Motion to Enforce Judgment (Dkt. 28) on March 8, 2024, seeking to enforce the settlement agreement between the parties. Subsequently, the Court referred the matter to Magistrate Judge Sarah L. Cave for consideration (Dkt. 29).

However, I am pleased to report that following the filing of our motion, the Defendants, BQA Transport LLC, Eddie Bal Doe, and RY-MO Logistics, Inc., have sent their first payment as per the terms of the settlement agreement. Furthermore, they have expressed their commitment to continue making timely payments as outlined in the agreement.

Given this positive development, and in the interest of resolving this matter amicably and without further litigation, Plaintiff Erving Suarez has instructed me to withdraw our Motion to Enforce Judgment (Dkt. 28) filed on March 8, 2024.

We are grateful for the Court's attention to this matter and regret any inconvenience caused by the need to file the motion to enforce the settlement agreement. It is unfortunate that such action was necessary to prompt compliance with the terms of the agreement.

Accordingly, we respectfully request that the Court consider this letter as a formal withdrawal of our Motion to Enforce Judgment (Dkt. 28). We trust that with the Defendants' demonstrated commitment to compliance, this matter will be resolved expeditiously and without the need for further judicial intervention.

Respectfully submitted,



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Application GRANTED. The Clerk of Court is respectfully directed to terminate the open motion at Dkt. 28.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

04/08/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

Lina Stillman, Esq.  
Counsel for Plaintiff Suarez